

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HELENA KRIZEK

Plaintiff,

-against-

THE QUEENS MEDICAL CENTER,  
DR. CHERYLEE CHANG,  
DR. THOMAS S. GALLAGHER,  
DR. NOBUHIRO ARIYOSHI,  
EDQUON LEE, ESQ.,  
MARGARET WILLE AND ASSOCIATES LLC.,  
MARGARET WILLE ESQ.,  
WILLIAM A. BORDNER ESQ.,  
DR. HAO CHIH HO,  
LEGACY OF LIFE HAWAII,  
LIONS EYE BANK OF HAWAII,  
HAWAII STATE DEPARTMENT OF HEALTH,  
DR. CHRISTOPHER HAPPY,  
MEDICAL EXAMINER OF HONOLULU, IN HIS  
OFFICIAL AND INDIVIDUAL CAPACITY,

Defendants.

Case No. 1:24-cv-07727

**NOTICE OF THE MOTION TO DISMISS OR TO  
CHANGE VENUE BY DEFENDANT EDQUON LEE, ESQ.**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Ronald W. Weiner, the accompanying Declaration of Edquon Lee, the accompanying Memorandum of Law, and all prior pleadings and proceedings herein, the undersigned will move this Court for an Order: pursuant to Rules 12(b) (1), (2) and (6) of the Federal Rules of Civil Procedure, dismissing the Complaint filed by plaintiff Helena Krizek ("Plaintiff") on the grounds it is barred by the statutes of limitations, it fails to state a cause of action against him, Plaintiff lacks standing to bring this action, and the Court lacks personal jurisdiction over him; or in the alternative, pursuant to 28

U.S.C. §§ 1404(a) or 1406(a), dismissing this action since the venue chosen by Plaintiff is improper and this action clearly lacks merit, or transferring the venue of this action to the United States District Court of Hawaii; and for other and further relief as the Court deems just and proper.

Dated: November 26, 2024

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

By:                     /s/                      
Ronald W. Weiner, Esq.  
Joseph L. Francoeur, Esq.  
Attorneys for *Defendant*  
*EDQUON LEE, ESQ.*  
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File No.: 99998.09231